THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JANE DOE, individually and : Civil Action No. 3:23-CV-00585-KM

on behalf of all other similarly

situated consumers,

:

Plaintiff

: CIVIL ACTION - LAW

v. : JURY TRIAL DEMANDED

:

LEHIGH VALLEY HEALTH

NETWORK, INC.,

:

Defendant:

NOTICE OF FILING OF NOTICE OF REMOVAL

To: Todd J. O'Malley, Esquire Mary Anne O. Lucas, Esquire O'Malley & Langan 201 Franklin Avenue Scranton, PA 18503

PLEASE TAKE NOTICE that Defendant, Lehigh Valley Health Network, Inc., on April 6, 2023, filed in this United States District Court for the Middle District of Pennsylvania a Notice of Removal of the state court action docketed in the Court of Common Pleas of Lackawanna County Pennsylvania at No. 23-CIV-1149. A copy of the Notice of Removal is attached and served with this Notice.

PLEASE TAKE FURTHER NOTICE THAT a certified copy of the Notice of Removal was filed this same date with the Clerk of Judicial Records of the Lackawanna County Court of Common Pleas in Lackawanna County, Pennsylvania.

PLEASE BE ADVISED that by virtue of 28 U.S.C. §1446 (d), this State Action is now removed to this the United States District Court for the Middle

District of Pennsylvania. The State Court has no further jurisdiction over this action and you should proceed no further in that court or under its authority.

Respectfully Submitted

CUMMINS LAW

DANIEL E. CUMMINS, ESQUIRE Attorney for Defendant, Lehigh Valley Health Network, Inc.

Dil E. Co

610 Morgan Highway Clarks Summit, PA 18411 Telephone: 570-319-5899 Facsimile: 570-319-5898

dancummins@cumminslaw.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within-captioned Notice of Filing of Notice of Removal was filed electronically with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the following CM/ECF participants on this case:

Simon B. Paris, Esquire <u>sparis@smbb.com</u> Patrick Howard, Esquire <u>phoward@smbb.com</u>

Elizabeth Adler, Esquire
eadler@kslaw.com
Matthew Brigman, Esquire
MBrigman@kslaw.com

Todd J. O'Malley, Esquire tomalley@omalleylangan.com
Mary Anne O. Lucas, Esquire mlucas@omalleylangan.com

Samuel J. Stauss, Esquire sam@turkestrauss.com Raina Borrelli, Esquire raina@turestrauss.com Respectfully Submitted

CUMMINS LAW

DANIEL E. CUMMINS, ESQUIRE Attorney for Defendant, Lehigh Valley

Dil E. Co

Health Network

610 Morgan Highway Clarks Summit, PA 18411 Telephone: 570-319-5899

Facsimile: 570-319-5898

dancummins@cumminslaw.net